

LAW OFFICES

Henry P. Bell, P.A.

HENRY P. BELL, ESQ.

6301 SUNSET DRIVE, SUITE 203
SOUTH MIAMI, FL 33143

TEL: (305) 665-8625
FAX: (305) 665-8624
HBELL@BELLPALAW.COM
WWW.HENRYBELLPAW.COM

June 5, 2015

Via CMECF & Fax: 212-805--7986

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007
(212) 805-0224
Fax: (212) 805-7986

Re: United States v. Thomas Alberto Clarke, Case No. 13-Crim-670-PGC.

Dear Judge Gardephe:

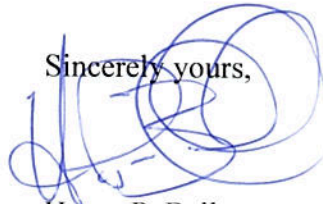
I represent the defendant, Tomas Alberto Clarke, in this case. I am writing on behalf of Mr. Clarke to request that the Court modify the conditions of bond as set forth below. The undersigned has conferred with counsel for the United States, Jason Cowley, about the relief being sought through this application made to the Court. This letter motion is filed with his consent and without objection from the United States.

Among the conditions of bond release in this case is the passports of the defendant and those of his wife (now former wife) and two minor daughters be held by pre-trial services while the case is pending. The defendant's former wife, Evelina Clarke and her two daughters, Alexandra Clarke and Isabela Clarke, plan on traveling to Panama on the dates July 2, 2015 through July 19, 2015 to visit their relatives living there. Tomas Clarke, the defendant, will not be traveling with them. Alexandra Clarke's passport is expired and therefore must be renewed if she is to take the trip with her mother and sister. As a result, not only are we requesting that the three passports be released as outlined in this letter, but that they be ordered released as the date the Court grants this application, if it is granted. In that way, Alexandra Clarke and her mother may renew her passport. An earlier trip to Panama this past Thanksgiving was cancelled or postponed until July of this year. Thus, the passports were never obtained and used or renewed then. We are kindly requesting that the Court grant this application so that Ms. Clarke and her daughters, both minors, may make the aforementioned trip.

In sum, Mr. Clarke respectfully requests that the Court modify the conditions of bond to release the passports of Evelina Clarke, Alexandra Clarke and Isabela Clarke to

Evelina Clarke. By order of the Court, those passports must be returned to United States Pretrial Services and Probation within 48 hours of their return to the United States from Panama.

Thank you for your attention to this matter.

Sincerely yours,

Henry P. Bell

Copy: AUSA, Jason Cowley
AUSA, Harry Chernoff
John Priovolos, Esq.
Nora Cruz, U.S. Pre Trial Services Officer